

WILLIAM M. NARUS, CAB #243633
Acting United States Attorney
District of Oregon
LEWIS S. BURKHART, OSB #082781
Assistant United States Attorney
Lewis.Burkhart@usdoj.gov
1000 SW Third Avenue, Suite 600
Portland, OR 97204-2902
Telephone: (503) 727-1000
Attorneys for United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:25-mj-00175

v.

**MOTION TO PARTIALLY UNSEAL
CASE**

JULIE WINTERS,

Defendant.

The United States of America moves this court for an order to partially unseal the above-captioned case. The United States requests the complaint and affidavit in support of the complaint remain under seal as the matter remains under investigation. The government will file a redacted version of the complaint and affidavit to be publicly available.

The above-captioned defendant has been arrested and the arrest warrant and complaint are necessary for initial appearance and other court purposes. The government intends to disclose the sealed document to defense counsel, but requests that only the redacted document be

referred to in public proceedings. The government requests the unredacted complaint remain sealed until further order of the Court or as justice may require.

Dated: June 25, 2025

Respectfully submitted,

WILLIAM M. NARUS
Acting United States Attorney

/s/ Lewis S. Burkhart
LEWIS S. BURKHART, OSB #082781
Assistant United States Attorney